

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION-FLINT

UNITED STATES OF AMERICA,
Plaintiff,

No. 06-20286

Hon. Paul V. Gadola

CHARLES GARY-DON ABBEY
Defendant.

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DEFENDANT'S REQUEST FOR DISCOVERY

The Defendant, Charles Abbey, hereby request the following to be produced for disclosure, inspection, and copying:

1. The substance of any relevant oral statement (a) made by the defendant in response to interrogation by a person the defendant knew was a government agent, (b) by the defendant to any undercover agent, (c) by the defendant to any to co-conspirators, (d) by the defendant to other witnesses, (f) any exculpatory statement by the defendant.
2. Any written or recorded statement by the defendant.

3. Books, papers, documents, data, photographs, tangible objects, buildings or places, material to preparing the defense; or that the government intends to use in its case-in-chief at trial; or was obtained from or belongs to the defendant.
4. Any scientific test or experiment conducted in the investigation of this case.
5. A written summary of any testimony that the government intends to use under Rules 702, 703 or 705 of the Federal Rules of Evidence during its case-in-chief at trial containing the witness's opinions, the bases and reasons for those opinions, and the witness's qualifications.
6. Statements of any witnesses the Government intends to call in the trial of the above matter.
7. Any exculpatory material, statements and information favorable to the accused.

Respectfully submitted,

Dated: June 9, 2006

s/CHARLES A. GROSSMANN
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Certificate of Service

I hereby certify that on June 9, 2006, I electronically filed the foregoing papers with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

Robert W. Haviland, Assistant United States Attorney

Respectfully submitted,

Dated: June 9, 2006

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